MIOSHA Michigan Occupational Safaty and Health Administration (MIC

AGENCY INSTRUCTION

Michigan Occupational Safety and Health Administration (MIOSHA) Department of Labor and Economic Opportunity (LEO)

DOCUMENT IDENTIFIER: DATE: MIOSHA-GEN-04-1R4 March 17, 2022

SUBJECT: UAW/Ford/MIOSHA Partnership

- I. Purpose. This directive establishes Department of Labor and Economic Opportunity (LEO)/Michigan Occupational Safety and Health Administration (MIOSHA) policy and instructions for all LEO responsibilities under the partnership agreement between the United Automobile Workers (UAW) International Union, Ford Motor Company, and MIOSHA.
- II. Scope. This instruction applies program wide.
- III. References. 2020 Strategic Partnership Agreement.
- IV. Distribution. MIOSHA Staff; Federal OSHA; S-drive Accessible; MIOSHA Messenger; and Internet Accessible.
- V. Cancellations. All previous versions of this agency instruction.
- VI. Next Review Date. This instruction will be reviewed in four (4) years from date of issuance.
- VII. History. History of previous versions included:

MIOSHA-GEN-04-1R3, January 5, 2017

MIOSHA-GEN-04-1R2, May 22, 2012

MIOSHA-GEN-04-2R2, May 2, 2012

MIOSHA-GEN-04-1R, January 10, 2006

MIOSHA-GEN-04-1, May 7, 2004

- VIII. Contact. Nella Davis-Ray, Division Director, Consultation Education and Training Division
- IX. Originator. Barton G. Pickelman, Director
- X. Background. In 2000, Occupational Safety and Health Administration (OSHA), the UAW, the Ford Motor Company, and Visteon Corporation joined together in a landmark partnership to improve worker safety and health at Ford and Visteon facilities. Because this agreement only addressed plants located in federal OSHA states, a similar agreement was pursued with MIOSHA.

In 2000, the MIOSHA director appointed the initial Ford Partnership Implementation Team (now referred to as the Project Team). The team's assignment was to make recommendations to the UAW/Ford/Visteon/MIOSHA Steering Committee on worksite selection, MIOSHA Day process, resources, compliance protocol, and partnership performance evaluation.

In 2003, the separate OSHA and MIOSHA partnership agreements were revised and extended to 2006. In 2007, a new MIOSHA agreement was signed for the partnership

with Automotive Components Holdings LLC replacing Visteon as a principle. In 2011, a joint OSHA/MIOSHA agreement with UAW and Ford Motor Company was signed. In 2016, a MIOSHA partnership agreement was signed with UAW and Ford Motor Company. OSHA was not included in this agreement. In 2020, this agreement was renewed with the UAW and Ford Motor Company. The instruction has been updated to reflect the changes to the partnership and the MIOSHA Day processes.

XI. Significant Changes.

- A. "Responsibilities" have been updated. The roles and responsibilities of the Consultation Education and Training (CET) Division's UAW/Ford/MIOSHA Partnership Coordinator (VIII.D.) and the MIOSHA Director (VIII. E.) were added.
- B. "Closing Meeting" definition added.
- C. "Monitoring Visit" definition updated.
- D. "Site Selection" under Pre-MIOSHA Days procedures updated. Site selection is now determined as part of the drafting process for the partnership agreement.
- E. "Meet and Greet" definition in Pre-MIOSHA Days procedures updated.
- F. "Closing Meeting "added to MIOSHA Day visit section. This part of the MIOSHA Day visit was not captured in the previous version of this instruction.
- G. "Monitoring Visit" updated. The assigned MIOSHA team is now responsible for doing the monitoring visit.
- H. "Focused Inspection" section removed.
- I. "Traditional Inspection" section removed.
- J. "Unprogrammed Inspection" section removed.
- K. "Cover Letter for Focused Inspection" appendix removed.
- L. Appendices numbering updated.

XII. Definitions.

- A. Closing Meeting Opportunity for MIOSHA team to review findings from the day's activities with the site leadership and the UAW/Ford Partnership members; provide an opportunity for the site representatives to ask questions and provide comments.
- B. Meet and Greet Informal meeting or teleconference between the MIOSHA Day team leader and/or team representative(s), site management, and UAW site representative(s) that precedes the scheduled MIOSHA Day meeting. Site documentation and injury and illness data will be requested by MIOSHA during the "Meet and Greet" or prior to teleconference.
- C. MIOSHA Day Meeting at a Ford location where MIOSHA representatives are briefed by the plant manager, the union chairperson, and their leadership team. The briefing will include a review of the injury and illness experience, developing

trends, and the results of the continuous internal comprehensive inspections conducted by the plant safety engineer and the unit health and safety representative, and the corrective actions taken. This meeting will include a discussion on key protocol(s) that offer opportunities for improvement in the site's health and safety performance followed by an onsite review and audit of those pre-selected protocols.

- Monitoring Visits One- or two-day informal walk-through scheduled after a MIOSHA Day to verify and/or collect additional information about the facility. This visit will involve a more in-depth records review, plant walk-through, and/or employee/management interviews in relation to the protocols.
- E. Safety Operating System (SOS) Internal Ford terminology used to describe the specific safety and health elements/protocols assessed as part of the MIOSHA Day site visit.

XIII. Responsibilities.

- A. MIOSHA Day Team This site-specific group of MIOSHA CET and General Industry Safety and Health Division (GISHD) staff will:
 - 1. Attend scheduled MIOSHA Day team training and meetings.
 - 2. Attend scheduled MIOSHA Day.
 - 3. Attend MIOSHA Day debriefings.
 - 4. Provide MIOSHA Day comments/observations to team leader for written report.
- B. MIOSHA Day Team Leader Appointed MIOSHA CET staff will:
 - 1. Make initial contact with selected site to request site documentation and schedule "meet and greet."
 - 2. Schedule and facilitate team meetings.
 - 3. Coordinate MIOSHA Day team site visits.
 - 4. Distribute materials to MIOSHA Day team for site visits.
 - 5. Draft written MIOSHA Day report.
 - 6. Submit final draft written MIOSHA Day summary report to the UAW/Ford/MIOSHA Partnership coordinator.
 - 7. Follow-up with sites to assure corrections have been made.
- C. MIOSHA Liaison Appointed CET Division staff will:
 - 1. Recommend MIOSHA Day team leaders and members.
 - 2. Develop and present MIOSHA Day team training sessions.
 - 3. Schedule MIOSHA Days.
 - 4. Schedule follow-up to assure corrective actions have been taken.

- 5. Maintain ongoing communications with all parties.
- 6. Prepare annual evaluation reports.
- D. Partnership coordinator A lead MIOSHA division is identified for providing oversight for each partnership. As lead, the Consultation Education and Training (CET) Division's UAW/Ford/MIOSHA Partnership Coordinator will:
 - 1. Coordinate partnership activities with the assigned MIOSHA liaison.
 - 2. Ensure draft MIOSHA Day reports are completed in a timely manner.
 - 3. Ensure that MIOSHA Day reports are submitted to the MIOSHA director in a timely manner.
 - 4. Approve MIOSHA Day team leaders and members.
 - 5. Ensure necessary partnership follow-up and evaluation.
 - 6. Ensure UAW/Ford/MIOSHA Partnership site files are maintained by the CET Division.

E. MIOSHA Director will:

- 1. Approve Ford sites for MIOSHA Day meetings.
- 2. Meet with the project team as appropriate to resolve any issues that arise during the course of this partnership.
- 3. Provide final reports to UAW and Ford.
- 4. Approve enforcement inspections when recommended.
- F. UAW/Ford/MIOSHA Steering Committee Appointed committee members will:
 - 1. Review data and reports from the MIOSHA Day meeting, monitoring visits, or focused inspections.
 - 2. Meet as appropriate to resolve any issues that arise during the course of this partnership.

XIV. Pre-MIOSHA Day Procedures.

- A. Site Selection The number of Ford sites in Michigan participating in a partnership will be determined as part of the drafting process for the current partnership agreement. During the term of the signed agreement, each site will receive at least one MIOSHA Day meeting.)
- B. Team Selection and Make-up Each site selected for a MIOSHA Day meeting will be assigned a MIOSHA Day team and team leader. Team size and make-up may vary from site to site.
- C. Site Documentation Prior to the scheduled "Meet and Greet" the site will provide a completed MIOSHA Day Site Information Sheet (see <u>Appendix A</u>) to the MIOSHA Liaison.

- D. "Meet and Greet" –This meeting can be done in person at the site or a phone conference. Approximately four weeks prior to the actual MIOSHA Day visit to the plant, the "meet and greet" will be held between MIOSHA and staff of the plant to be visited.
 - 1. This meeting is an opportunity for introductions, discussion of MIOSHA Day concerns, and to exchange comments. During this meeting participants will:
 - a) Review and finalize the MIOSHA Day Agenda. (see Appendix B)
 - b) Identify any special needs; for example, personal protective equipment in preparation for MIOSHA Day.
 - c) Address issues related to the Safety Operating System (SOS) Protocols. (see Appendix C)
 - 2. "Meet and greet" participants should include the following:
 - a) Plant manager, plant chairperson, human resources manager, plant safety engineers, and UAW plant health and safety representatives.
 - b) MIOSHA liaison and MIOSHA team leader.

The scheduled MIOSHA Day visit will be contingent upon receipt and review of requested site documentation.

E. Team Meetings – After the team is selected and requested site documentation is received, at least one pre-MIOSHA Day team meeting will be held. The purpose of the meeting will be to review requested site documentation in preparation for the site's MIOSHA Day presentation and walk-through. In addition to pre-MIOSHA Day team meeting(s) there will be a post MIOSHA Day team meeting to debrief and compile recommendations for the MIOSHA Day report.

XV. MIOSHA Day Visit.

- A. The purpose of this meeting is to provide the partners of the agreement with a site-specific briefing on the progress made toward achieving the agreement's goals. The Ford site is responsible for hosting this meeting. The host site will schedule presenters, provide the meeting location, and facilitate the meeting. Each host site should request the attendance and participation of a UAW chairperson and plant manager. MIOSHA will be responsible for paying for their own lunch and refreshments.
- B. MIOSHA will conduct an informal walk-through as part of the MIOSHA Day meeting including, upon request, receiving other documentation from the partners. The walk-through should focus on SOS elements/protocols, include some working operations, and allow for informal employee interviews. Findings of the walk-through and reasonable abatement will be discussed during the MIOSHA Day closing session.

XVI. MIOSHA Day Debriefing.

After the shop floor tour is completed the MIOSHA Day team will have a debriefing on site. The purpose of the debriefing is for the team to discuss their observations and to provide information to the team leader for the MIOSHA Day report. The MIOSHA Day report is a concise written summary based on a report outline (see <u>Appendix D</u>).

The report will include justification for a future monitoring visit if deemed necessary by the MIOSHA Day team. If no future monitoring visits are needed, the site's MIOSHA Day file will be closed once all follow-up issues and monitoring are completed. The letter and report may include a request for follow-up actions. The final draft MIOSHA Day report will be submitted to the MIOSHA director within 30 days of the MIOSHA Day meeting for signature. Copies of the final report will be sent to the UAW, Ford, and Steering Committee members within 60 days of the MIOSHA Day visit.

XVII. Closing Meeting.

Once the MIOSHA Day team has completed their debriefing meeting, the local site leadership team and the UAW/Ford Partnership members in attendance will convene in a closing meeting with the MIOSHA Day team. During this closing session, the MIOSHA team will summarize their observations during the MIOSHA Day visit and provide an opportunity for site leadership and UAW/Ford Partnership members to comment/summarize.

XVIII. Monitoring Visit.

- A. Based on the MIOSHA Day debriefing and team recommendations, the MIOSHA Day team may return at a later date for a one- or two-day monitoring visit. The monitoring visits shall only address the inadequacies disclosed during the pre-MIOSHA Day team meeting or the MIOSHA Day visit. The monitoring visits will involve a more in-depth records review, site walk-through, and/or employee/management interviews in relation to the protocols.
- B. MIOSHA staff conducting the monitoring visits refer to the MIOSHA DAY Site Information Sheet to determine if the violation(s) noted fall under the SOS Elements the site management listed as initiatives they are focusing on for improvement (see Appendix A). All apparent serious violations shall be brought to the attention of the site management and employee representatives at the time they are documented. Citations can be issued. The findings of the monitoring visits may result in a team recommendation for an enforcement inspection. Prior to a decision for an enforcement inspection, a review will be completed with the appropriate division directors.

XIX. Evaluating and Measuring Partnership Outcomes.

The primary outcome measure for partnership success is a reduction in injury and illness rates. Annually a MIOSHA evaluation report will be developed and presented at a corporate meeting between the parties (see Appendix E). The report will address trends noted in data collected and a summary of common issues identified during MIOSHA Days. In addition, the annual report will include a review of partnership activities. Report activity measures include:

- A. Number of meet and greet sessions.
- B. Number of MIOSHA Days conducted.
- C. Number of un-programmed inspections (pre-partnership vs. post-partnership).
- D. Number of programmed inspections (pre-partnership vs. post-partnership).
- E. Number of OTS violations.
- F. Number of consultations.
- G. Number of training programs conducted.
- H. Number of employees affected by all of the above activities.
- I. Number of follow-up actions taken by.

XX. Public Request for Partnership Information Requests.

All requests for information on activities related to the partnership agreement between MIOSHA, the UAW International Union, and Ford Motor Company shall be forwarded to the MIOSHA Freedom of Information Act (FOIA) coordinator. The coordinator shall respond to these requests in accordance with the Department FOIA Procedures and Guidelines.

Appendix AMIOSHA Day Site Information Sheet

			A Day Site				
	To be sent to	o MIOSHA Li	aison at leas -	t 1-month bel	fore scheduk	ed event day	
Site:							
Site Addres					te of Event:		
Parking - Any	y Special Consid	erations:					
PPE: □ Safe	ety Glasses 🗆 i	Hi-Vis Vest □ I	 Hard Hat □ Lo	ng-Sleeves 🗆	Safety-Toe Shoe	es 🗆 Other:	
Contact (Fa	rd) - Name:				Title:		
	Enail:				Phone:		
Contact (8%	lir') - Name:				Title:		
	Enail:				Phone:		
			Site M	letrics			
Year	Hours Worked (all employees)	Total Recordabl e Cases (G+H+I+J)	Total Case Incident Rate (TCIR)	Total Days Away Cases (H)	Lost Time Case Rate (LTCR)	Restricted # Jeb Treasfor Cares (DART)	DART Rate
Current - YTD							
2019							
2018							
		S	OS Initiative	es - <i>All Site</i>	9.5		
1. PMHV - W	nat are you wor	king on to imp	rove?				
2. PMHV - WI	nat do you need	assistance wit	h?				
3. ECPL - Wh	at are you work	ing on to impro	ove?				
4. ECPL - Wh	at do you need a	ssistance with	?				

	Si	ite Chosen	SOS Eleme	nt		
1. Element?						
2. What are you working on to	o improve?					
3. What do you need assistan	on with?					
S. What do you need assistant	ce with:					
4 City Providence						
4. Site Best Practice(s):						
5. What are you doing & why	is it a best prac	ctice?				
Vk	o Should B	eceiue Cor	siac of tha l	Event Repo	rt2	
Name:	o onouiu i	ieceive co	Title:	Lvent Hepo		
Email:			Title:			
Name:			Title:			
Email:						
Name:			Title:			
Email:						
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Email:			Title.			
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	- JUA	WK 🥩	ord MI	OSHA		
	Try	N.P.	area.	- Committee		
				1		
MIOSHA Liaison:		Rob		Bafety Consu <u>nichigan.gov</u>	litant	
			269-25	4-6779		

Appendix BMIOSHA Day Agenda

Morning Session (45 - 60 minutes):

- Welcome and participant introductions.
- Review previous MIOSHA Day Report.
- Review injury and illnesses statistics.
- Discuss MIOSHA visits.
- Identify high priority protocols with respect to specific areas of plant.
- Discuss action plans/needs.
 - -MIOSHA assistance
 - -Corporate assistance
 - -NJCHS assistance
- Begin Shop Floor Tour w/emphasis on specifically identified protocols, opportunities, best practices, other process challenges.

Afternoon Session (120 – 180 minutes):

- Continue Shop Floor Tour w/emphasis on specifically identified protocols, opportunities, best practices, and other process challenges.
- Actions taken or being taken by the plant to address the high priority issues.
- Close with responsibilities identified.

The final agenda will be mutually agreed upon. The team leader will request a finalized agenda from the host site.

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Appendix CSOS Protocols

- 1. Safety Training
- 2. Incident Investigation
- 3. New Process Design
- 4. Risk Assessment
- 5. High Risk Process
- 6. Safe Practices for Walking Working Surfaces and Housekeeping
- 7. Contractor Safety
- 8. Plant Layout to Optimize Pedestrian Safety
- 9. Powered Material Handling Vehicle Safety
- 10. Visitor Safety
- 11. Energy Control and Power Lockout (ECPL)
- 12. Working at Heights
- 13. Mobile Elevating Work Platform
- 14. Personnel Protective Equipment (PPE)
- 15. Cranes and Hoist Safety
- 16. Secondary Restraints
- 17. Combustion Safety
- 18. Confined Space
- 19. Electrical Safety
- 20. Respiratory Protection
- 21. Laser safety
- 22. Hearing Conservation and Noise Control
- 23. Ionizing Radiation Safety
- 24. Heat Stress

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- 25. Lifting and Rigging
- 26. Machine/Equipment Guarding
- 27. Lead and Hexavalent Chromium
- 28. Asbestos Safety
- 29. Crystalline Silica
- 30. Employee Airborne Chemical Risk Assessment
- 31. Chemical Safety Training (Hazard Communication)
- 32. Medical Surveillance (MSS)
- 33. Ergonomics
- 34. Emergency Preparedness

Note: Protocols may be added/removed via steering committee consensus without making modifications to this agreement.

Appendix DMIOSHA Day Report

Facility Name MIOSHA Day Report Date

- 1) Physical Address
- 2) Key Participants (see attached sign-in sheets):

United Auto Workers (UAW):

Ford:

National Joint Committee on Health and Safety (NJCHS):

MIOSHA:

- 3) Observations from Walk-Around:
- 4) Opportunities for Improvement:
- 5) Best Practices Observed:
- **6) Injury and Illness Trends** Recordable Rates [20xx-Present]

20xx Current Year-to- Date and prior two full years	Hours	Total Recordable Injuries and Illnesses Cases	Total Case Incident Rate (TCIR)	Total Cases with Days Away from Work or Restricte d Activity	Days Away, Restricted, Transferre d Rate (DART)	Total Cases with Days Away from Work	Lost- Time Case Rate (LTCR)
*Current							
20xx							
20xx							

*Year to Date

- 7) Discussion of Injury and Illness Trends:
- 8) Outstanding/Overdue Items from Previous Safe Operating System (SOS) Self Assessments:

	rch 17, 2022 W/Ford/MIOSHA Partnership
9	9) Noted Issues of Non-Compliance (if any):
-	10) Discussion of Safety Operating System (SOS) Results Trends:
	11) Monitoring Visit Recommended? Yes No

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Other Comments:

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Appendix EMIOSHA Partnership Annual Report

Name and Address of Partnership: Strategic Partnership Agreement Between MIOSHA, UAW
International Union, and The Ford Motor Company
Lead MIOSHA Division: Consultation Education and Training Division (CET)
Name of Evaluator:
Evaluation Period:
MIOSHA-300 Log Rates (TCIR and DART) - Averages for all Partnership worksites included in the
evaluation.
Other Partnership Measurement Data:
Analysis/Explanation of Changes in Rates and Other Data:
Impact of Partnership:
Partnership Challenges/Concerns:
Dlang to Improve Doutnoughin.
Plans to Improve Partnership:
Recommendation:
Accommendation.
Facility Data for Evaluation Period: